



U.S. Department of Justice

*United States Attorney
Southern District of New York*

*The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007*

June 11, 2021

VIA ECF

The Honorable Mary Kay Vyskocil
United States District Court
Daniel Patrick Moynihan Courthouse
500 Pearl Street
New York, New York 10007

Re: *United States v. Navarro et al.*, 20 Cr. 160 (MKV)

Dear Judge Vyskocil:

The Government respectfully writes to update the Court on discussions among the parties regarding proposed trial groupings and deadlines for expert disclosures. On May 27, 2021, the Government circulated among counsel for each of the remaining defendants the following proposed list of trial groupings, listed in the Government's proposed chronological ordering of the respective trials:

Group 1:

Seth Fishman
Lisa Giannelli
Jordan Fishman

Group 2:

Christopher Oakes
Marcos Zulueta
Rick Dane Jr.

Group 3:

Jorge Navarro
Erica Garcia
Michael Tannuzzo
Rebecca Linke

Group 4:

Jason Servis
Kristian Rhein
Alexander Chan
Michael Kegley

On June 10, 2021, the Government and a subset of counsel for the defendants convened a conference call to discuss the proposed trial groupings and expert notification deadlines. On that call, counsel for the defendants confirmed that the group on the call would report on the discussion and note any objections to a joint proposal by counsel for defendants not represented on that call. In light of that discussion, the parties propose that expert notifications, as to each of the trial groupings set forth above, be provided no later than 60 days in advance of the first day of each respective trial.

The Government has circulated this proposal to counsel for all defendants and has received no objections, although counsel for Seth Fishman has alerted the Government that he may, following conferral with his client, submit a separate letter regarding the topics covered herein.

Respectfully submitted,

AUDREY STRAUSS
United States Attorney

by: /s/ Andrew Adams
Sarah Mortazavi
Andrew Adams
Assistant United States Attorneys